

Additional Practice Expense Items During a Public Health Emergency (PHE) – CPT 99072

Last Updated: 2/5/2024

Last Reviewed: 2/12/2025

Originally Effective: 9/8/2020

Last update includes payment policy changes, subject to 28 TAC §3.3703(a)(20)(D)? No

If yes, Texas Last Update Effective Date: n/a

Policy #: RPM074

Scope

Companies: Moda Partners, Inc. and its subsidiaries & affiliates (All)

Provider Contract Status: Any

Claim Forms: CMS1500 & CMS1450 (paper and electronic versions)

Claim Dates: All

Reimbursement Guidelines

A. General

The AMA released CPT code 99072 effective for dates of service 09/08/2020 and following¹, to cover the cost for additional supplies and clinical staff time to perform safety protocols. CPT 99072 allows for the provision of evaluation, treatment or procedural services during a public health emergency (PHE) in a setting where extra precautions are taken to ensure the safety of patients as well as healthcare professionals.

B. Overall Policy Statement

No separate reimbursement will be made for 99072 under any circumstances.

C. CMS Policy for 99072

1. CMS has designated 99072 as a status B on the OPPS fee schedule (Not paid under OPPS).²
2. CMS has designated 99072 as a status B (Bundled, never eligible for separate reimbursement) status indicator on the Physician Fee Schedule.

D. Reimbursement for 99072

1. 99072 is considered bundled, always part of the primary procedure being performed on the same day, and not eligible for separate reimbursement. Providers may report 99072 on a claim for services, but no reimbursement will be issued.
2. Exceptions: None.
3. Explanation for Providers Located in the State of Washington.
 - a. The state of Washington passed Substitute Senate Bill (SSB) 5169 requiring separate reimbursement for personal protective equipment (PPE) during the Covid emergency. This rule was signed into law on April 16, 2021.^{6,7}
 - b. SSB 5169 applies to services incurred from April 16, 2021 through the end of the federal public health emergency, which occurred at the end of the day of May 11, 2023.^{7,8,9}
 - c. The state of Washington SSB 5169 requirement to allow separate reimbursement for PPE applies only to insured plans issued in state of Washington. We do not have any of those plans, so this requirement does not apply to our member plans.

E. PHE Declared Ended

The Federal Covid-19 Public Health Emergency (PHE) ended at 11:59 PM on May 11, 2023.^{8,9} For dates of service 5/12/2023 and following, 99072 may only be reported if another public health emergency which is due to a respiratory-transmitted infectious disease is officially declared (state or federal). However, even under those circumstances, 99072 is not eligible for separate reimbursement.

Definitions

Acronyms/Abbreviations

Acronym	Definition
AMA	American Medical Association
AHA	American Hospital Association
CCI	Correct Coding Initiative (see "NCCI")
CMS	Centers for Medicare and Medicaid Services
CPT	Current Procedural Terminology
ED	Emergency Department (also known as/see also ER)
ER	Emergency Room (also known as/see also ED)
HCPCS	Healthcare Common Procedure Coding System (acronym often pronounced as "hick picks")
HIPAA	Health Insurance Portability and Accountability Act
ICD	International Classification of Diseases
ICD-10	International Classification of Diseases, Tenth Edition
ICD-10-CM	International Classification of Diseases, Tenth Edition, Clinical Modification
ICD-10-PCS	International Classification of Diseases, Tenth Edition, Procedure Coding System
MPFSDB	(National) Medicare Physician Fee Schedule Database (aka RVU file)
MUE	Medically Unlikely Edits
NCCI	National Correct Coding Initiative (aka "CCI")
OPPS	Outpatient Prospective Payment System
PHE	Public Health Emergency
PHEIC	Public Health Emergency of International Concern
PPE	Personal Protective Equipment
PTP	Procedure-To-Procedure (a type of CCI edit)
RPM	Reimbursement Policy Manual (e.g., in context of "RPM052" policy number, etc.)
RVU	Relative Value Unit
SSB	Substitute Senate Bill (State of Washington)
WHO	World Health Organization

Definition of Terms

Term	Definition
Practice Expense	The costs associated with the direct and indirect practice resources involved in furnishing medical services.
Public Health Emergency	An extraordinary event which is determined to constitute a public health risk through the spread of disease and requires a coordinated response
Public Health Emergency of International Concern (PHEIC)	A formal declaration by the World Health Organization (WHO) of a public health emergency of international scale. ¹⁰

Related Policies

- A. ["Moda Health Reimbursement Policy Overview."](#) Moda Health Reimbursement Policy Manual, RPM001.
- B. ["Medical, Surgical, and Routine Supplies."](#) Moda Health Reimbursement Policy Manual, RPM021.
- C. ["Hospital Routine Supplies and Services."](#) Moda Health Reimbursement Policy Manual, RPM043.

Sources

1. American Medical Association. "COVID-19 Coding Update." *CPT Assistant*, SPECIAL EDITION September 2020: 1-3.
2. CMS. "October 2020 Update of the Hospital Outpatient Prospective Payment System (OPPS)." *MLN Matters*, MM11960 Revised, September 24, 2020. <https://www.cms.gov/files/document/mm11960.pdf> .
3. Burgette, Lane F., et al. "Practice Expense Methodology and Data Collection Research and Analysis - Interim Phase II Report." RAND Corporation. <https://www.cms.gov/files/document/cy-2021-pfs-practice-expense-methodology-and-data-collection-research-and-analysis-report.pdf> .
4. CMS. "2002 Changes and Corrections." Medicare Part B News, Issue # 194, page 24.
5. CMS. *Medicare Claims Processing Manual* (Pub. 100-4). Chapter 12 – Physician Practitioner Billing, § 20.4.4, 20.4.6.
6. State of Washington (SoW). "Certification of Enrollment Substitute Senate Bill 5169." <https://lawfilesexternal.wa.gov/biennium/2021-22/Pdf/Bills/Senate%20Passed%20Legislature/5169-S.PL.pdf#page=1>
7. Busz, Andrew. "New PPE Billing Law in Effect." Washington State Hospital Association (WSHA). June 9, 2021: last accessed October 12, 2021. <https://www.wsha.org/articles/new-ppe-billing-law-in-effect/> .
8. CMS. "CMS Waivers, Flexibilities, and the Transition Forward from the COVID-19 Public Health Emergency." February 27, 2023. Last accessed March 13, 2023. <https://www.cms.gov/newsroom/fact-sheets/cms-waivers-flexibilities-and-transition-forward-covid-19-public-health-emergency> .
9. USNews. "Biden Administration Announces Plan to End COVID-19 Emergency Declarations." Published January 30, 2023. Last accessed April 26, 2023. <https://www.usnews.com/news/national-news/articles/2023-01-30/biden-administration-announces-plan-to-end-covid-19-emergency-declarations> .

Policy History

Reminder: The most current version of our reimbursement policies can be found on our provider website. If you are using a printed or saved electronic version of this policy, please verify the current information by going to: https://www.modahealth.com/medical/policies_reimburse.shtml

Date	Summary of Update
2/12/2025	Formatting updates. No policy changes.
2/14/2024	Formatting updates. No policy changes.
6/14/2023	Updated for end of Federal PHE on 5/11/2023. 99072 was and remains not eligible for separate reimbursement, thus update not subject to 28 TAC. Minor rephrasing. No policy changes.
10/12/2022	Acronyms updated. Formatting updates. No policy changes.
11/18/2020	Policy document initially approved by the Reimbursement Administrative Policy Review Committee & initial publication.
9/8/2020	Original Effective Date (with or without formal documentation). Policy based on Claims Management administrative decision to follow CMS policy for 99072. Regulatory team review of SSB 5169.